



United States Environmental Protection Agency

Region I

5 Post Office Square, Suite 100  
Boston, MA 02109-3912

**URGENT MATTER -- PROMPT REPLY NECESSARY**  
**CERTIFIED MAIL: RETURN RECEIPT REQUESTED**

**FEB 16 2016**

Mr. David Back, Site Operations Manager  
Quantum Clean  
3 Washington Avenue  
Scarborough, ME 04074

**RE: NOTICE OF VIOLATION** of the Resource Conservation and Recovery Act (RCRA), the Hazardous and Solid Waste Amendments of 1984 (HSWA), and the State of Maine Hazardous Waste Management Rules, Chapters 850-860.

Dear Mr. Back:

On September 17, 2014, representatives of the United States Environmental Protection Agency ("EPA") conducted a RCRA Compliance Evaluation Inspection. The purpose of this inspection was to determine the compliance of Quantum Clean, EPA ID No. MER000510131, with the State of Maine Hazardous Waste Management Rule, Chapters 850-860, and the federal Hazardous Waste Management Regulations found at 40 CFR Parts 260-272. The State of Maine has been granted final authorization by EPA to administer certain portions of RCRA.

As a result of the inspection noted above, EPA has determined that your facility violated certain provisions of Chapters 850-860 and the RCRA regulations, promulgated at 40 CFR Parts 260 through 272. The violations are set forth below:

- ✓ 1. Failure to operate within Quantum Clean's notified hazardous waste generator status due to accumulated amounts of hazardous waste;
- ✓ 2. Failure to make adequate hazardous waste determinations;
- ✓ 3. Failure to meet satellite accumulation area management standards;
- ✓ 4. Failure to train employees with hazardous waste management duties;
- ✓ 5. Failure to manage universal waste fluorescent lamps to ensure prevention of damage and breakage;
- ✓ 6. Failure to label containers of universal waste fluorescent lamps; and
- ✓ 7. Failure to record the start accumulation date for universal waste fluorescent lamps.

*Med Training Records for:*  
David Back - I<sup>st</sup> EC  
Gerald Clark - AIT EC  
Robert Bassard - SAA OP  
Bill Robinson - " " Backup  
Scott St Onge - " " Backup

**Immediately upon receipt of this NOTICE:**

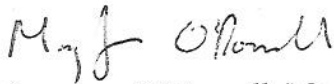
**Quantum Clean must address the requirements set forth above and must immediately begin and continue to operate in compliance with all applicable Federal and State regulations.**

**Within (30) thirty calendar days of receipt of this NOTICE, submit a written description, with supporting documentation, of the actions taken to address items 1 through 7, above. Submit the information to:**

Susann D. Nachmann, Environmental Engineer  
U.S. Environmental Protection Agency  
Office of Environmental Stewardship (OES05-4)  
5 Post Office Square, Suite 100  
Boston, Massachusetts 02109-3912

Failure to correct the violations as required by this NOTICE may subject the facility to further Federal enforcement action, including the assessment of penalties, pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928. If you have any questions regarding this NOTICE, please contact Susann D. Nachmann, of my staff, at (617) 918-1871.

Sincerely,



Mary Jane O'Donnell, Manager  
RCRA, EPCRA & Federal Programs Unit

cc: Michael Hudson, MEDEP